I.3
4/26/99

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
Pollution Report

I. Heading

DATE: April 26, 1999

SUBJECT: Tilton Plating Emergency Response, Tilton, Vermilion County, Illinois

FROM: Cindy Nolan, OSC, USEPA, Region 5, Chicago, RS 2

TO:
K. Mould, U.S. EPA, OSWER, Washington, DC.....(FAX)
W. Carney, Chief, EERB, Chicago, IL.....(FAX)
B. Bolen, Chief, RS-II, Chicago, IL.....(FAX)
B. Messenger, Chief, ESS, Chicago, IL.....(FAX)
G. Narsete, OPA, Chicago, IL.....(FAX)
A. Coyle, ORC, Chicago, IL.....(FAX)
Lt. Tansey, USCG 2.....(703) 235-4837
U.S. Fish & Wildlife Service IL.....(309) 793-5804
M. Weber, IEPA, Springfield, IL..... (217) 782-3258

POLREP # 6

II. BACKGROUND

Site No: B589 **Delivery Order No:** 0007
CERCLIS No: ILSFN0507790 **ERNS No:**
Response Authority: CERCLA **NPL Status:** Non-NPL
State Notification: **Start Date:** 9/25/98
Demobilization Date: **Completion Date:**
Status of the Action Memorandum: Signed on 12/14/98

III. INCEDENT INFORMATION

Review the Initial POLREP

IV. RESPONSE INFORMATION

1. Current situation

During the week ending April 24, 1999, ERRS began excavation and staging contaminated soil and debris from the approximately 400-square foot area. The weather condition for the week was cloudy with several days of rain, which limited the work activities on 4/21/99. The estimated rain accumulation was approximately 1 to 2 inches. The temperatures during the week ranged from the upper 30°F to the mid 60°F.

On 4/19/99, Approximately 50 cubic yards of non-hazardous debris was transported off site to the local disposal facility. ERRS began excavation of hazardous soil and debris from the western section of the facility. An abandoned water pipe line was detected during the excavation, and the soil above the pipeline was excavated for the length of the area of concern. The remaining soil inside section BC-2 (40 feet by 20 feet) was excavated approximately one foot and the trench area was excavated approximately 2 feet. Four composite soil samples were collected from section BC-2, which included two from the trench area. The samples were hand delivered to the lab for 24-hour turnaround time for sample results.

On 4/20/99, ERRS continued excavation. After completing the BC-2 area, ERRS excavated five 400-square foot grids outside BC-2. The grids were excavated at a depth of six inches. The material was then staged awaiting disposal. Composite samples were collected from each grid area. The initial BC-2 grid sampling results indicated elevated levels inside the southern trench area and both sections of BC-2.

On 4/21/99, ERRS continued excavation of BC-2 area. ERRS excavated approximately six inches of contaminated soil. The southern trench area had accumulated yellowish colored water. After ERRS completed the excavation of BC-2, three composite samples and one water sample were collected; hand delivered to the lab; and analyzed for total chromium. The composite sample results from the five grids outside BC-2 were below the state action level for chromium, cadmium, and lead. Work was limited to due to rainy condition.

On 4/22/99, ERRS began loading trucks and continued excavating contaminated soil. At the end of the day, six trucks (containing approximately 20 tons per truck) were load and transported to the disposal facility.

On 4/23/99, ERRS loaded five trucks. The second round of sampling results from BC-2 indicated levels above the state's action level for chromium and in the water. The second trench composite sample result, which included areas that were not underwater, was below the action level. ERRS excavated an additional 6 to 8 inches from BC-2. A conference call was held with OSC Nolan, ERRS, START, U.S. EPA ORC, and Conrail to discuss collecting samples from the area west of the property. Conrail indicated their property boundaries were 25 feet on both sides of the track. OSC Nolan requested permission to collect samples from the creek 20 to 25 feet west of the railroad tracks. Conrail denied permission to sample until 4/29/99. Samples were collected from the ridge area over 25 feet east of the tracks at a depth of 6 to 9 inches. A third round of composite samples were also collected from BC-2. The samples were hand delivered to the lab for analysis.

2. Removal activities to date:

- Overpacked deteriorated containers.
- Staged of all drums and other containers in building.
- Secure the building.
- Sampled, hazcatted, and categorized all disposal waste streams on site.
- Arrangement off site of T & D of drums and debris.
- Conducted an extent of contamination soil study.
- Conducted T & D for the material inside the building (Seven waste manifest were shipped out).
- Demolish building.
- Sort non-hazardous and hazardous building debris.
- Began air monitoring during demolition and excavation.
- Loaded non-hazardous debris into roll-off boxes and transported them for disposal.
- Completed air sampling for lead, cadmium, and chromium.
- Begin excavation of contaminated concrete and soil.
- Arranged the T & D for the contaminated concrete and soil.

B. Planned Removal Action:

- Continue excavation of contaminated material.
- Continue loading contaminated material for disposal.
- Collect sediment and water samples on Conrail property.
- Additional excavation pending sample results from the ridge and Conrail.
- Backfill excavated areas and restore residential properties.

C. Next Step

No further action

C. Key Issues

Based on IEPA investigations, there may be additional contaminated soil on the property west of the current excavation area and on Conrail property. Presently, the U.S.EPA has been given access to the property to collect samples on 4/29/99 in the presence of a Conrail engineer.

After the waste was accepted by Chem-Met in Brownstown, MI, loaded onto the truck, and transported to their facility on 4/13/99, Chem-Met contacted Earth Tech on 4/14/99, informing them that another manifest was required for the cyanide and flammable paint waste. The waste was not being disposed of at the facility, but at another facility in Orlando, FL. The Illinois manifests were returned to the disposal facility on 4/14/99, and the material was transported to Orlando, FL.

V. COST INFORMATION (for week ending 4/24/99)

Affiliation	Present Cost	Ceiling	% Remaining
Earth Tech (4/22/99)	147,607.00	250,000.00	51.0
START	20,908.50	30,000.00	30.1

Disposal Table

Tilton Plating Site
Tilton, Vermilion County, Illinois

Waste	Date	Volume	Manifest Number	Disposal facility
RQ, Hazardous solid, n.o.s., (cadmium) UN3077	4/13/99	15 cubic yards	ILD98491925599-02	Chem-Met Services 18550 Allen Rd. Brownstown, MI 48192
RQ, Environmental hazard Sub. n.o.s. 9, (copper sulfate), PG III	4/13/99	1 drum (50 lbs.)	ILD98491925599-02	Chem-Met Services
RQ, Hazardous Waste, Liquid, n.o.s. 9, (chromium), NA 3082, PG III	4/13/99	14 drums (885 gallons)	ILD98491925599-01	Chem-Met Services
RQ, PCBs, n.o.s. 9, UN2315, PG III	4/14/99	1 drum (125 lbs.)	00003	Superior Special Services 1275 Mineral Springs Dr. Port Washington, WI 53074
RQ, Waste Paint Related material, 3, UN1263, PG II*	4/14/99	1 drum (100 lbs.)	ILD98491925599-04	Chem Con 10100 Rocket Blvd Orlando, FL, 32824
RQ, Waste Cyanide Solution, n.o.s. (zinc cyanide, potassium cyanide) 6, UN1935 PG I*	4/14/99	1 drum (40 lbs.)	ILD98491925599-05	Chem Con
RQ, Waste Corrosive Liquid, n.o.s. 8, UN 1760, PG III (chromium)	4/14/99	9 drums (515 gallons)	ILD9849192559-06	Chem-Met
RQ, Waste Corrosive Liquid, n.o.s. 8, UN 1760, PG III (sodium Hydroxide)	4/14/99	12 drums (720 gallons)	ILD9849192559-07	Chem-Met
Non-Hazardous Debris	4/15/99	20 cubic yards	Profile # 540728-01	Waste Management Twin Bridges Danville, IN
Non-Hazardous Debris	4/16/99	55 cubic yards	Profile # 540728-2 & 3	Waste Management Twin Bridges Danville, IN
Non-Hazardous Debris	4/19/99	50 cubic yards	Profile # 540728-4 & 5	Waste Management Twin Bridges Danville, IN
RQ, Waste Corrosive, Solid, n.o.s. 9 (chromium) NA 3077	4/21/99	120 tons	ILD98491925599-08 to 013	USL City Environmental 1923 Fredrick St. Detroit, MI 48211
RQ, Waste Corrosive, Solid, n.o.s. 9 (chromium) NA 3077	4/22/99	100 tons	ILD98491925599-014 to 018	USL City Environmental 1923 Fredrick St. Detroit, MI 48211

* - Chem-Met indicated that their MI facility could not accept or dispose of the cyanide and flammable solid waste streams. The manifest needed to be changed with the Orlando, FL, facility accepting the waste, or the load would have been rejected.